

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ANN COYLE, on behalf of herself and  
all other similarly situated persons,

Plaintiff,

v.

AVENT AMERICA, INC., PHILIPS  
ELECTRONICS NORTH AMERICA CORP.,  
GERBER PRODUCTS CO., HANDI-CRAFT  
CO., NALGE NUNC INTERNATIONAL CORP.,  
PLAYTEX PRODUCTS, INC.

Defendants.

Case No. 08-3407

Judge James F. Holderman

**UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO  
ANSWER OR OTHERWISE PLEAD PENDING DECISION ON  
CONSOLIDATION BEFORE THE MDL PANEL**

Defendant Avent America, Inc., by its attorneys and pursuant to Federal Rule of Civil Procedure 6(b), requests an extension of time to answer or otherwise plead to Plaintiff's Complaint. In support of the Motion, Defendant states as follows:

1. On June 12, 2008, Plaintiff filed her Complaint. On July 22, 2008, Avent executed a waiver of service, and Avent's answer is due on August 13, 2008.
2. On or about June 20, 2008, Plaintiff filed a motion with the Panel on Multidistrict Litigation ("MDL Panel") to join an already pending motion to transfer and consolidate this action pursuant to 28 U.S.C. § 1407 with a number of similar putative class actions and "tag-along" actions pending in various United States district courts.
3. While consolidation is likely, the parties disagree on the correct forum. In briefing before the MDL Panel, the parties have suggested four potential transferee jurisdictions,

including the Northern District of Illinois, the Western District of Missouri, the District of Kansas, and the Central District of California.

4. A hearing on the motion to transfer is scheduled before the MDL Panel on July 31, 2008.

5. Defendant requests an extension of time to answer or otherwise plead until thirty days after the MDL Panel rules on the motion to transfer and consolidate.

6. Counsel for Plaintiff has informed Defendant's counsel that Plaintiff has no objection to this Motion.

7. An extension of time is in the interest of judicial economy because it will allow Defendant to answer one consolidated complaint, instead of multiple complaints. The motion is not made for purposes of delay, nor will an extension of time prejudice Plaintiff.

WHEREFORE, for the reasons stated above, Defendant Avent America, Inc. respectfully requests that this Court allow them an extension of time to answer or otherwise plead to the Complaint until thirty days after the MDL Panel has ruled on the motions to transfer and consolidate, and for any other relief this Court deems just and equitable.

Dated: July 23, 2008

Respectfully submitted,

/s/ Kristen E. Hudson  
One of the Attorneys for Defendant  
Avent America, Inc.

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**CERTIFICATE OF SERVICE**

I, Kristen E. Hudson, an attorney, hereby certify that on July 23, 2008, I electronically filed the foregoing **Unopposed Motion for an Extension of Time to Answer or Otherwise Plead Pending Decision on Consolidation Before the MDL Panel** using the Court's CM/ECF system, which will automatically send electronic notification of such filing to the following individuals:

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